

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

SARIAH MOODY, ET AL., )  
                            )  
Plaintiffs,             )  
                            )  
v.                         ) No. 4:20-CV-00526-HFS  
                            )  
                            )  
CITY OF KANSAS CITY, MISSOURI, )  
                            )  
Defendant.             )  
                            )  
                            )

**Fourth Consent Motion for Extension of Time to Respond to Motion to Dismiss**

With consent of Defendant, Plaintiffs move this Court for a thirty-day extension of time to respond to Defendant's motion to dismiss, ECF No. 32. In support, they state:

1. On December 6, 2021, Defendant filed a motion to dismiss for failure to state a claim upon which relief can be granted, ECF No. 32, accompanied by suggestions in support, ECF No. 33.
2. Plaintiffs' response to the motion was initially due on December 27, 2021.
3. Without opposition from Defendant, Plaintiffs have previously requested and were granted three extensions—through April 26, 2022—to file their response in order to permit the parties to continue discussions about settling the case.
4. As of today's date, counsel for the parties have drafted the principal terms of a settlement that would include presentation of certain amendments to City ordinances to the City Council for consideration, and Plaintiffs have provided final approval of the settlement agreement.

5. However, additional time is needed for the Defendant to both obtain final approval of the settlement agreement and determine a date certain by which the proposed amended ordinances can be presented to the City Council.
6. The settlement cannot become final without agreement upon a date certain for when the proposed amended ordinances could be presented to City Council, and approval and execution of the settlement agreement by the City.
7. Other matters have taken precedence at the City but counsel for Defendant has communicated to counsel for Plaintiffs that Defendant should be able to determine within the next thirty days whether the final settlement approved by Plaintiffs will receive final approval at the City and, if so, also set a date certain to present the proposed ordinance amendments to the City Council.
8. The parties therefore require additional time to reach a final resolution.
9. Defendant's counsel consents to this request.

WHEREFORE Plaintiffs request this Court grant them until May 26, 2022, to respond to the pending motion to dismiss at which time Plaintiffs anticipate that a stipulation of dismissal will be filed with this Court.

Respectfully submitted,

/s/ Gillian R. Wilcox  
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*Attorney for Plaintiffs*

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Gillian R. Wilcox